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CHAMBERS OF KIMBA M. WOOD
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November 17, 2016

VIA ECF, E-mail and Hand Delivery

Honorable Kimba M. Wood
Senior United States District Judge
for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. Williams, Steven Brown, Gerald Seppala.
Docket No. S3 16 Cr. 436 (KMW)

**Letter Application Seeking The Court's Permission For
Defendant Steven Brown To Travel To Europe On Business**

Dear Judge Wood:

I write again as the attorney for defendant Steven J. Brown and seek for Mr. Brown the Court's permission for a European trip to France for a crucial business trip for an essential French Film Sales Market. He would also welcome the opportunity to celebrate Christmas with his wife and other family members in France and depart the day after Christmas.

Mr. Brown seeks to travel to Europe between December 14 through December 26, 2016. It is important that he be in France during this period as well as being present at the Festival de Cinema European Des Arcs in the Savoy Region of France for an extended period during its film sales especially from December 15 through December 17 and the following days to conclude end of the quarterly sales that are crucial to Mr. Brown's ability to support his family and legal defense.

Granted.
Know

Honorable Kimba M. Wood

-2-

November 17, 2016

End of the year film sales are especially important to buyers who are interested in two specific films that Mr. Brown is the executive producer on and these potential buyers have sought face-to-face meetings with Mr. Brown and his partners. Furthermore, Mr. Brown's presence in Europe during this time to provide his professional skills and judgment on film purchase decisions is essential to his future business prospects.

In this request for international travel permission, I have intentionally not mentioned the specific titles of the films involved, his business colleagues nor his specific agenda in light of the significant damage done to Mr. Brown and his business associates regarding "Dance Angels" that was disclosed in my August 31, 2016 letter to the Court, the instant dissemination of that information by someone whose identity is yet undetermined and a resulting e-mail barrage on September 1 of inaccurate, polemical information with deleterious impact on Mr. Brown's business prospects as mentioned in my letter to the Court of September 8, 2016. Both of my prior letters to the Court are appended as an aid for the Court's convenience. Of course, every travel and itinerary factor of importance will be provided to Pretrial Services Officer Carter as Mr. Brown has customarily provided in his prior travel to Europe as approved by the Court.

Finally, I do seek several days prior to December 16 when Mr. Brown would like to depart so he can secure a ticket which is a challenge during this time of year. France unfortunately is a target of well known security threats and Mr. Brown would like to travel as safely as possible. This permits Mr. Brown to conduct crucial business and to celebrate the holiday in France with his wife and her mother, plus other French family relatives, with his return to the United States no later than December 26, 2016.

I have written this letter well in advance of Mr. Brown's requested travel dates because we believe the short lead time of our prior requests may have affected his inability to attend his wife's birthday and their Goddaughter's baptism in France last summer.

I have communicated with Assistant United States Attorney Patrick Egan who on behalf of the government does maintain his continuing objection to international travel as it poses flight risks for criminal defendants. He does not anticipate filing with the Court a further objection to this request for international travel. I have also communicated with Mr. Brown's Pretrial Services Officer Matthew Carter; Pretrial Services as before takes no position on international travel but does note that Mr. Brown is and has been in compliance with his Court ordered obligations.

Finally, I believe neither the government nor Pretrial Services would challenge Mr. Brown's past compliance with his prior international travel that was approved by this Court.

Honorable Kimba M. Wood

-3-

November 17, 2016

Thank you for your consideration.

Respectfully submitted,



Walter Mack

cc: AUSA Patrick Egan (by ECF and email)
PTSO Matthew Carter (by email)
PTSO Natasha Ramesar (by email)

*If Probation imposes
reporting requirements for Mr. Brown while
he is abroad, this Order is issued on condition
that Mr. Brown comply with those conditions*
61-21-16
SO ORDERED: N.Y., N.Y.

Kimba M. Wood

KIMBA M. WOOD
U.S.D.J.